

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JIMMY GONG  
and JIMMY'S SPORTSHOP, INC.

Plaintiff,

23-CV-05401 (PKC)(JMW)

-against-

**DEFENDANTS' INITIAL  
DISCLOSURES PURSUANT  
TO FRCP 26(a)**

LIEUTENANT MARC TIMPANO, individually,  
SERGEANT WILLIAM RUSSELL, individually  
and THE COUNTY OF NASSAU,

Defendants.

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Defendants, Lt. Marc Timpano, Sgt. William Russell and the County of Nassau,  
appearing herein by their attorney, Thomas A. Adams, County Attorney of Nassau County, by Ralph  
J. Reissman, Deputy County Attorney, as and for their initial disclosures pursuant to Federal Rules of  
Civil Procedure 26(a), state as follows:

A. The following individuals are likely to have discoverable information that defendants may  
use to support their defense in this action.

Jimmy Gong

[REDACTED]

Jia Zeng

[REDACTED]

Nassau County Police Lt. Marc Timpano  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Police Sgt. William Russell  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Vincent Chiarelli  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Thomas Calvert  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Michael Maloney  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Joseph Paduano  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Michael Wall  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Michael Dunn  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. John James  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Patrick Rail  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Lance Zimmerman  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Det. Justin Moore  
1490 Franklin Avenue  
Mineola, New York 11501

Nassau County Assistant District Attorney Jeremy Glicksman  
262 Old County Road  
Mineola, New York 11501

Trijicom  
49385 Shafer Avenue  
P. O. Box 930059  
Wixom, Michigan

EOtech  
46900 Port Street  
Plymouth, Michigan 48170

B. Pursuant to Rule 26(A)(1)(a)(ii) of the Federal Rules Civil Procedure, defendants describe the following documents and tangible things defendants have in their possession which defendants may use to support their defenses: (1) Files maintained by the Nassau County Police Department, 1490 Franklin Avenue, Mineola, New York 11501, copies of which may be made available for inspection and copying by plaintiff, and (2) Files maintained by the Nassau County District Attorney's Office, 262 Old Country Road, Mineola, New York 11501, copies of which may be made available for inspection and copying by plaintiff, or may be produced by counsel in the process of pretrial discovery.

C. Computation of damages by disclosing party: Not applicable.

D. Insurance information: Not applicable.

Defendants reserve the right to revise and/or supplement the foregoing disclosures as information becomes available during the course of litigation.

Dated: Mineola, New York  
November 6, 2023

**THOMAS A. ADAMS**  
Nassau County Attorney  
Attorney for Defendants

By: /s/ Ralph J. Reissman  
RALPH J. REISSMAN  
Deputy County Attorney  
1 West Street  
Mineola, New York 11501  
(516) 571-3046